

As described in the specification and depicted, for example, at Figure 3, a variation in temperature exists between the battery modules because of fabrication tolerances. (See, for example, page 7, lines 19-26). A target width of the cooling flow paths is set so this variation is maintained within a predetermined range. (See, for example, page 8, lines 8-18). All the battery modules therefore have a predetermined temperature or less when the coolant flows through the coolant flow paths. (See, for example, page 8, lines 19-23).

Accordingly, Applicants submit that the terms "predetermined range," "predetermined temperature," and "target width" are not indefinite, and respectfully request reconsideration and withdrawal of the rejections.

Claim rejections - 35 U.S.C. § 102(b)

Claims 1-18 stand rejected under 35 U.S.C. § 102(b) as being anticipated by WO 98/31059 ("*Ovshinsky*"). Applicants respectfully traverse this rejection.

Independent claim 1 is directed a fluid-cooled battery pack system. The battery pack system comprises at least one coolant inlet and outlet, a battery pack, and a coolant transport device for introducing the coolant into the coolant inlet. A target width of the coolant flow path is set so that a variation in temperature between the battery modules caused by a fabrication tolerance relative to the target width of the coolant flow paths is maintained within a predetermined range and all the battery modules have a predetermined temperature or less when the coolant flows through the coolant flow paths.

In other words, a target width is set in consideration of a minimum cooling variation caused by fabrication tolerances. For example, as shown in Figure 3, a curve HT_{max} represents a heat transfer coefficient when the fabrication tolerance of a cooling slit width is a maximum (i.e., target width plus fabrication tolerance) and curve HT_{min} represents a heat transfer

coefficient when the fabrication tolerance of a cooling slit width is a minimum (i.e., target width minus fabrication tolerance). As shown in Figure 3, a target width can be set taking into consideration a cooling variance caused by the fabrication tolerances (for example, the difference between HTmax and HTmin). See, for example, page 8, lines 8-25.

Ovshinsky relates to a fluid-cooled battery pack with coolant flow channels and coolant inlets and outlets. However, *Ovshinsky* does not disclose or suggest, however, the relationship recited in claim 1 where a target width is set so that a variation in temperature between the battery modules caused by a fabrication tolerance relative to the target width is maintained within a predetermined range and all the battery modules have a predetermined temperature or less when the coolant flows through.


For the above reasons, Applicants submit that independent claim 1 is allowable over the cited art. In addition, claims 2-18 depend from claim 1 and are believed allowable for at least the same reasons. Moreover, each of these dependent claims recites additional features and is believed allowable in its own right. Individual consideration of the dependent claims is respectfully requested.

In view of the above, favorable reconsideration in the form of a notice of allowance is requested.

Respectfully submitted,

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